UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA WILKES-BARRE DIVISION

In re:

William H. Handy, Jr.

Allison Lorraine Handy : Case No.: 14-03360-RNO

Debtors. : Chapter 13

: 11 U.S.C. §362

Beneficial Opportunity Fund, LLC

Movant : Chief Judge Robert N. Opel II

v. :

William H. Handy, Jr. and :

Allison Lorraine Handy, :

Respondents. :

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Beneficial Opportunity Fund, LLC has filed a MOTION FOR RELIEF FROM AUTOMATIC STAY with the court to permit foreclosure of a lien on real property located at PROPERTY ADDRESS: 9 Sunrise Drive, Milford Pennsylvania 18337.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before <u>July 2, 2019</u> you or your attorney must do all of the following:
 - (a) file an answer explaining your position at:

U.S. Bankruptcy Court Max Rosenn U.S. Courthouse 197 South Main Street, Room 274 Wilkes-Barre, PA 18701

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney:

Kathryn Wakefield, Esq. DWALDMANLAW, P.C. Attorneys for Movant 4900 Carlisle Pike, #182 Mechanicsburg, PA 17050 844-899-4162 844-882-4703 Fax

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Chief Judge Robert N. Opel II on July 23, at 9:30 AM, HB Courtroom, United States Bankruptcy Court, Middle District of Pennsylvania Court, 197 S. Main St., Wilkes-Barre, PA Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 877-298-2053 to find out whether the hearing has been canceled because no one filed an answer.

DWALDMANLAW, P.C. 4900 Carlisle Pike, #182 Mechanicsburg, PA 17050 Telephone: (844) 899-4162 Facsimile: (844) 882-4703

Primary email:bankruptcy@dwaldmanlaw.com

Email: kathryn@dwaldmanlaw.com Email 2: lynne@dwaldmanlaw.com Attorneys for Secured Creditor

By: <u>/s/ Kathryn Wakefield</u>
Kathryn Wakefield, Esq.
PA Bar ID# 85395